

### REMARKS

#### Applicant's statement of substance of interview.

Applicants wish to express appreciation to Examiner Samuel Heinrich for the courtesy of an interview which was granted to Applicant's representative Michael Faibisch (Reg. No. 48,427). The interview was held at the USPTO on February 22, 2006. The Examiner's summary of the substance of the interview is set forth in the Interview Summary, Paper No. 02222006. During the interview, the Examiner clarified his rejection by proposing that element 44 in the Jain reference is a focusing element that is inherently movable for tooling focus. Applicants' representative pointed out rather that elements 10 in the Jain reference focus the beams to different locations but that elements 10 are not movable. No agreement was reached.

#### General remarks

Claims 188 – 191 are pending in the application. Claims 1 – 187 and 192 – 313 are canceled. No amendments are currently being made.

Applicant has carefully studied the outstanding Office Action in the present application. The present response is intended to be fully responsive to all points of rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application are respectfully requested.

#### Claim Rejections

Claims 188 - 189 stand rejected under 35 U.S.C. 102(a) as being anticipated by Jain et al. (US6,515,257). Claims 190 – 191 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Jain et al. (US 6,515,257) and JP 406043505A or JP02003051142A.

Applicants respectfully traverse the rejections as applied to the rejected claims.

Jain describes a high speed maskless via generation system employing a high-power laser beam divided into multiple beamlets which are simultaneously directed to different via sites by a spatial light modulator array. JP 406043505A and JP02003051142A, as noted by the Examiner

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in the Office Action mailed on February 15, describe well known acousto-optical deflecting elements.

Independent claim 188 requires “focusing said plurality of laser beams to different independently selectable locations, said focusing comprising moving at least one optical element, without f-theta optical elements”. As noted by the Applicant’s representative in the interview held on February 22, 2006, In Jain, focusing the beams to locations is performed by elements 10, which are not movable. With respect to element 44 of Jain serving as a focusing element, as proposed by the Examiner, Applicants respectfully note that element 44 is positioned upstream of homogenizer 30, and thus does not affect focus properties of the beam output from homogenizer 34.

Although element 44 is moveable and is characterized in Jain as a “focusing element”, because it is located upstream of homogenizer 30, its movement merely affects the manner by which the light distributed within the homogenizer, and thus the degree of homogenization and intensity of output beam 34. Movement of element 44 in Jain, however, does not affect focus properties of beams output from the homogenizer 30 at locations downstream of the homogenizer 30.

Because movement of element 44 in Jain does not affect focusing of the output beam 44, Applicants respectfully submit that Jain fails to show or describe focusing the plurality of laser beams to different independently selectable locations, the focusing comprising moving at least one optical element, without f-theta optical elements, as required by independent claim 1. None of these deficiencies would be remedied by any of the other art cited in the present Office Action.

In view of the foregoing the Examiner is respectfully requested to withdraw the rejection of claim 188, and of its dependent claims 189 – 191 which are each patentable at least by virtue of their dependency from claim 188.

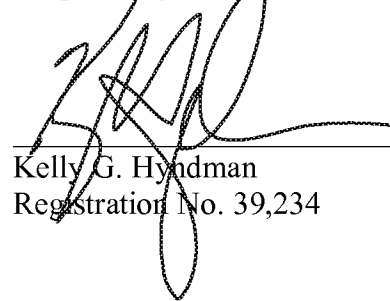
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Conclusion and request for telephone interview

In view of the foregoing, this application is believed to be in order. Reconsideration and allowance of this application are respectfully solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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